

## REMARKS

Applicants reply to the Final Office Action dated March 12, 2010 within two months. Claims 1-17 are pending in the application and the Examiner rejects claims 1-17. Support for the amendments may be found in the originally-filed specification, figures and claims. No new matter is entered with these amendment. Applicants respectfully request reconsideration of this application.

### **Rejections under 35 U.S.C § 103**

The Examiner rejects claims 1, 2, 4, 7-10, 12, and 15-17 and under 35 U.S.C. § 103(a), as being unpatentable over Walker et al., U.S. Patent No. 5,798,508 (“Walker1”), in view of Bliss et al., U.S. Patent No. 5,999,938 (“Bliss”) in view of Kalajan, U.S. Patent No. 5,941,954 (“Kalajan”), in view of Masinter et al., U.S. Patent No. 7,409,405 (“Masinter”) in view of Zhang et al., U.S. Patent Application Publication No. 2004/0255287 (“Zhang”), in view of Walker et al., U.S. Patent No. 5,949,044 (“Walker2”). The Examiner rejects claims 3 and 11 and under 35 U.S.C. § 103(a), as being unpatentable over Walker1 in view of Bliss in view of Kalajan in view of Masinter in view of Zhang in view of Walker2 in further view of Hejlsberg et al. U.S. Patent No. 7,165,239 (“Hejlsberg”). The Examiner rejects claims 5-6 and 13-14 under 35 U.S.C. § 103(a), as being unpatentable over Walker1 in view of Bliss in view of Kalajan in view of Masinter in view of Zhang in view of Walker2 in further view of Gleason et al., U.S. Patent Application Publication No. 2003/0195762 (“Gleason”). Applicants respectfully disagree with these rejections, but Applicants present claim amendments in order to clarify the patentable aspects of the claims and to expedite prosecution.

Walker1 generally teaches “a system and method for issuing and clearing traveler’s checks that are paid for by credit card,” (abstract). Specifically, Walker1 teaches “the present invention is a system and method for issuing and clearing travelers checks that are not paid for until they are used,” (col. 1, lines 38-40, emphasis added). “Although the credit lock prevents customer 106 from using a portion of the credit line of the credit card, the customer has not been charged for the checks and retains full use of the funds represented by the checks,” (col. 3, lines 33-36). In direct contrast to teaching a system and method associated with prepaid services and prepaid goods, such as “wherein the messages are related to the sale of at least one of a prepaid service and a prepaid good,” as recited by independent claim 1 (emphasis added) and similarly

recited by independent claims 9, and 17. Thus, Walker1 teaches away from the suggested combination and is an unsuitable reference under 35 U.S.C. § 103. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of dependent claims 1, 2, 4, 7-10, 12, and 15-17.

Additionally, as noted by the Examiner on page 3 of the Office action, Walker1 fails to disclose or contemplate “a proxy application coupled between a seller application and a supplier application,” as recited by independent claim 1 and similarly recited by independent claims 9, and 17. Therefore, Walker1 fails to disclose or contemplate at least “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Bliss generally teaches “a system and method for creating a new data structure in memory populated with data from an existing data structure,” (abstract). Bliss discloses that “data from more than one source data structure can be used to create and populate a destination data structure without having to manually re-enter the data from each of the source data structures” (col. 4, lines 60-64). However, nothing has been found in Bliss to disclose or contemplate at least “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Kalajan generally teaches “a method for redirecting communication on a network between a client and a network resource,” (abstract). Kalajan discloses a “message redirection application 20 which reroutes messages between general purpose application 24 and network resource 14,” (col. 4, lines 49-50). “A corresponding proxy application is located at the network resource 14 end,” (col. 4, lines 64-66). “The corresponding proxy application can decrypt incoming messages and encrypt returning messages destined to client 10,” (col. 5, lines 1-2). Nothing has been found in Kalajan, however, to disclose or contemplate at least “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and

that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Masinter relates to “a file dispatcher for multiple application targets,” (abstract). Masinter discloses “a proxy converter that can change a file type of a file to a file type that can be opened by an application that is installed on a computer system,” (col. 5, lines 57-59). Masinter, however, also fails to disclose or contemplate at least “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Zhang relates to “a method and apparatus for updating inter-server communication software,” (abstract). Zhang discloses “a software update proxy function program that preferably functions between a UDP layer and an application process of a server within in a multi-server communication system,” (paragraph 0030). Zhang, however, also fails to disclose or contemplate at least “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Walker2 generally teaches “a financial transfer system which allows a transferor to transfer credit or to make payment to a transferee by debiting the credit card of the transferor and crediting the credit card of the transferee,” (abstract). Specifically, using the system of Walker2, “a transferor cannot repudiate intent to transfer a credit line amount once a transferor gives the encrypted code to the transferee,” (col. 15, lines 5-7). Thus, using the system of Walker2 repudiation is contingent on encryption. However, the proxy application disclosed in the present application may “ensure that a receiver or a sender of the message cannot dispute having received or sent the message” independent of an encryption, as recited in independent claim 1 and similarly recited by independent claims 9, and 17. Also, Walker2 fails to disclose or contemplate at least “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Applicants traverse the official notice taken by the Examiner on page 4 of the Office action because “the facts asserted to be well known are not capable of instant and unquestionable demonstration as being well-known.” MPEP 2144.03. Applicants therefore respectfully request that “the examiner provide documentary evidence in the next Office action if the rejection is to be maintained.” *Id.*

The cited references either alone or in combination do not disclose or contemplate at least, each of “wherein the messages are related to the sale of at least one of a prepaid service and a prepaid good,” and “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Dependent claims 2, 4, 7-8, 10, 12, and 15-16 variously depend from independent claims 1 and 9. Therefore, Applicants assert that dependent claims 2, 4, 7-8, 10, 12, and 15-16 are patentable for at least the same reasons stated above for differentiating independent claims 1, 9, and 6 as well as in view of their own respective features. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of dependent claims 2, 4, 7-8, 10, 12, and 15-16.

Hejlsberg generally teaches “an application program interface (API) provides a set of functions that make available support for processing XML documents for application developers who build Web applications on Microsoft Corporation's .NET.TM. platform,” (abstract). Hejlsberg, however, also fails to disclose or contemplate at least “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Hejlsberg alone or in combination with the cited references do not disclose or contemplate at least, each of “wherein the messages are related to the sale of at least one of prepaid services and prepaid goods,” and “a proxy application coupled between a seller

application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Dependent claims 3 and 11 variously depend from independent claims 1, and 9. Therefore, Applicants assert that dependent claims 3 and 11 are patentable for at least the same reasons stated above for differentiating independent claims 1, and 9 as well as in view of their own respective features. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of dependent claims 3 and 11.

Gleason generally teaches “an automatic workflow architecture provides a design and execution environment for computer-automating business processes, where a user knowledgeable only in the business process itself can create and run the automation of the process without assistance from programmers,” (abstract). Gleason, however, also fails to disclose or contemplate at least “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Gleason alone or in combination with the cited references do not disclose or contemplate at least “wherein the messages are related to the sale of at least one of prepaid services and prepaid goods,” and “a proxy application coupled between a seller application and a supplier application, wherein the proxy application is configured to authenticate that the message was created by a known sender, and that the message was not altered in transit,” as recited in independent claim 1 (emphasis added) and similarly recited by independent claims 9, and 17.

Dependent claims 5-6 and 13-14 variously depend from independent claims 1 and 9. Therefore, Applicants assert that dependent claims 5-6 and 13-14 are patentable for at least the same reasons stated above for differentiating independent claims 1 and 9 as well as in view of their own respective features. Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of dependent claims 5-6 and 13-14.

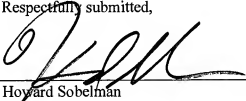
The claims of the present application are different and possibly broader than the claims pursued in related applications. To the extent any amendments or characterizations of the scope of any claim or referenced art could be construed as a disclaimer of any subject matter supported by the present disclosure, Applicant hereby rescinds and retracts such disclaimer. Accordingly, the references construed in the related applications may need to be revisited.

When a phrase similar to “at least one of A, B, or C” or “at least one of A, B, and C” is used in the claims or specification, Applicants intend the phrase to mean any of the following: (1) at least one of A; (2) at least one of B; (3) at least one of C; (4) at least one of A and at least one of B; (5) at least one of B and at least one of C; (6) at least one of A and at least one of C; or (7) at least one of A, at least one of B, and at least one of C.

Applicants respectfully submit that the pending claims are in condition for allowance. The Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account No. **19-2814**. Applicants invite the Examiner to telephone the undersigned, if the Examiner has any questions regarding this Reply or the present application in general.

Respectfully submitted,

Dated: May 11, 2010

By:   
Howard Sobelman  
Reg. No. 39,038

**SNELL & WILMER LLP.**  
400 E. Van Buren  
One Arizona Center  
Phoenix, Arizona 85004  
Phone: 602-382-6228  
Fax: 602-382-6070  
Email: [hsobelman@swlaw.com](mailto:hsobelman@swlaw.com)